

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

LISA VAN BUSKIRK Plaintiff	:	Case No. 2:15-cv-03025-MCA-LDW
	:	
	:	
vs.	:	
	:	
PREMIER RECOVERY GROUP	:	
&	:	
JOEY YOUNGER	:	
&	:	
QUINTON M. SMITH	:	
Defendants	:	
	:	

**PLAINTIFF’S MOTION FOR ENTRY OF DEFAULT JUDGMENT AGAINST
DEFENDANT, JOEY YOUNGER**

Plaintiff, LISA VAN BUSKIRK, by and through her attorney, Brent F. Vullings, Esquire, respectfully moves Your Honorable Court to enter a default judgment against Defendant, JOEY YOUNGER, in the amount of \$8,857.50 based upon the Affidavit of counsel, Brent F. Vullings, Esquire and for the reasons set forth below:

1. On April 29, 2015, Plaintiff, a consumer, filed a Complaint in the United States District Court for the District of New Jersey against Defendant, Joey Younger, seeking statutory damages under the Fair Debt Collection Practices Act (“FDCPA”), 15 U.S.C. §1692, et seq.
2. Service was personally effectuated upon Defendant, Joey Younger on June 15, 2015 by personal service and an Affidavit of Service was filed with this Court on June 19, 2015.
3. As of the date of this Motion, Defendant has failed and refused to respond to the Complaint and Summons.
4. On July 16, 2015, Defendant was served with copies of the Request for Entry of Default and Supporting Affidavit of counsel, Brent F. Vullings, Esq.

5. Plaintiff is entitled to statutory damages in the amount of \$1,000.00 based upon the actions of Defendants, in violation of the FDCPA, as outlined in the Complaint.

6. Plaintiff is entitled to costs in the amount of \$590.

7. Vullings Law Group, LLC are entitled to attorney's fees and costs in the amount of \$7,267.50 for its prosecution of the claim as outlined by the statutes.

8. The attached Affidavit of Counsel sets forth the basis for the amount of the default judgment requested against Defendants.

WHEREFORE, Plaintiff, LISA VAN BUSKIRK, respectfully requests this Honorable Court enter Default Judgment against Defendant, JOEY YOUNGER, in the amount of \$8,857.50.

Vullings Law Group, LLC

BY: /s/ Brent F. Vullings
Brent F. Vullings, Esquire
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